

Message

From: Corsentino, Mark A. [Mark.Corsentino@awwu.biz]
Sent: 7/23/2020 8:02:41 PM
To: Andrews, Raymond [andrews.raymond@epa.gov]; Hladick, Christopher [hladick.christopher@epa.gov]; Kenknight, Jeff [Kenknight.Jeff@epa.gov]
CC: Brune, Jason W (DEC) [jason.brune@alaska.gov]; Martinson, Mathew [martinson.mathew@epa.gov]; Larson, Tiffany M (DEC) [tiffany.larson@alaska.gov]; janice.wiegers@alaska.gov; M Klingman [marie.klingman@alaska.gov]; Halverson, John E (DEC) [john.halverson@alaska.gov]; wwwasmc@muni.org; Fordham, Tami [Fordham.Tami@epa.gov]; Stoddard, Jamey [Stoddard.Jamey@epa.gov]; Le, Michael [Le.Michael@epa.gov]; Jencius, Michele [jencius.michele@epa.gov]; Rife, Annette M. [rife.annette@epa.gov]; Levo, Brian [Levo.Brian@epa.gov]; Falsey, William (Bill) D [FalseyWD@ci.anchorage.ak.us]; Davidson, Deatra S. [Deatra.Davidson@awwu.biz]; Forbus, Timothy H. [Timothy.Forbus@awwu.biz]; Plaskett, John L. [John.Plaskett@awwu.biz]
Subject: RE: EPA Follow-up to PFAS-contaminated Wastewater Acceptance
Attachments: AWWU_EPA_NOV_RESPONSE_7-23-20_signed.pdf; Exhibit 4 - Notification New Waste Stream NRC PFOS.pdf; Exhibit 5 - NRC Waste Stream Data - PFOA PFOS.pdf; Exhibit 6 - NRC Waste Stream Data - Other PFAS.pdf; Exhibit 1 - Existing TIDP Permit Template.pdf; Exhibit 2 - Notification New Waste Stream Form.pdf; Exhibit 3 - Notification New Waste Stream NRC PFOA.pdf

Raymond, Jeff, Chris and all,
Attached is AWWU's response to EPA's NOV.
A hard copy is being mailed to Jeff.
I appreciate your engagement and look forward to further collaboration with EPA on this topic.



Mark A. Corsentino, P.E.
General Manager
Anchorage Water & Wastewater Utility
Direct: 907-786-5511
Cell: 907-917-6551
Mark.Corsentino@awwu.biz

AWWU is investing to ensure reliable service, safeguard public health, and protect the environment, long into the future.

From: Andrews, Raymond <andrews.raymond@epa.gov>
Sent: Tuesday, July 21, 2020 10:10 AM
To: Corsentino, Mark A. <Mark.Corsentino@awwu.biz>
Cc: Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Martinson, Mathew <martinson.mathew@epa.gov>
Subject: RE: EPA Follow-up to PFAS-contaminated Wastewater Acceptance

This is an email from an external entity. DO NOT click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Corsentino,

Thank you for your email. We look forward to your NOV response. Our Water Division will be contacting you to discuss the programmatic and policy issues raised in your message. In the meantime, those issues should not affect your ability for AWWU to list actions, steps, and processes it intends to implement to ensure compliance with the notification requirements of Section IV.A. of the Permit.

Sincerely,

Raymond Andrews
Compliance Officer
Surface Water Enforcement Section
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 155, 20-C04
Seattle, WA 98101
(206) 553-4252

Scientia est potentia!

From: Corsentino, Mark A. <Mark.Corsentino@awwu.biz>

Sent: Wednesday, July 08, 2020 10:40 AM

To: Andrews, Raymond <andrews.raymond@epa.gov>; Hladick, Christopher <hladick.christopher@epa.gov>; Brune, Jason W (DEC) <jason.brune@alaska.gov>

Cc: Larson, Tiffany M (DEC) <tiffany.larson@alaska.gov>; janice.wiegers@alaska.gov; M Klingman <marie.klingman@alaska.gov>; Halverson, John E (DEC) <john.halverson@alaska.gov>; www.masmc@muni.org; Fordham, Tami <Fordham.Tami@epa.gov>; Stoddard, Jamey <Stoddard.Jamey@epa.gov>; Le, Michael <Le.Michael@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Jencius, Michele <jencius.michele@epa.gov>; Rife, Annette M. <rife.annette@epa.gov>; Levo, Brian <Levo.Brian@epa.gov>

Subject: RE: EPA Follow-up to PFAS-contaminated Wastewater Acceptance

Raymond,

We are working on the response to the NOV to provide the information EPA has required within the 45 calendar days. I do have a time sensitive issue that needs resolution pertaining to a statement EPA made in the NOV.

In the NOV, EPA stated, "Accepting wastewater contaminated with persistent bioaccumulative organic pollutants from outside your service area, e.g., Fairbanks International Airport, is inconsistent with this objective (of the 301(h) toxics control program)."

Based on that statement, we've taken the precautionary step to suspend NRC's TIDP to discharge pre-treated PFAS compounds into our POTW until we can resolve what EPA is looking for with regards to PFAS disposal.

That step has had a ripple effect and has created a challenge for the State of Alaska to manage the disposal of these compounds.

We intend to submit in our NOV response a more formal request from EPA to pre-treat and dispose of these compounds.

Other than a State groundwater cleanup level (which is the default level we have required for pre-treatment prior to discharge into our POTW) and a human health advisory level (Cook Inlet is not a potable water source), there are no federal standards for PFAS compounds that we are aware of that pertain to their disposal in POTW's.

What is EPA recommending and/or requiring for PFAS discharge into POTW's?

Is there a limit of PFAS compounds that an industrial discharger could pre-treat to such that it would not be viewed by EPA as a contaminated wastewater?

Any additional input from EPA in dealing with the time sensitive issue to resolve the proper treatment and disposal of PFAS compounds in wastewater would be appreciated.

Thanks,



Mark A. Corsentino, P.E.
General Manager
Anchorage Water & Wastewater Utility
Direct: 907-786-5511
Cell: 907-917-6551
Mark.Corsentino@awwu.biz

AWWU is investing to ensure reliable service, safeguard public health, and protect the environment, long into the future.

From: Andrews, Raymond <andrews.raymond@epa.gov>

Sent: Friday, June 12, 2020 10:46 AM

To: Corsentino, Mark A. <Mark.Corsentino@awwu.biz>

Cc: Larson, Tiffany M (DEC) <tiffany.larson@alaska.gov>; janice.wiegers@alaska.gov; M Klingman <marie.klingman@alaska.gov>; Halverson, John E (DEC) <john.halverson@alaska.gov>; wwmasmc@muni.org; Fordham, Tami <Fordham.Tami@epa.gov>; Stoddard, Jamey <Stoddard.Jamey@epa.gov>; Le, Michael <Le.Michael@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Jencius, Michele <jencius.michele@epa.gov>; Rife, Annette M. <rife.annette@epa.gov>; Levo, Brian <Levo.Brian@epa.gov>

Subject: EPA Follow-up to PFAS-contaminated Wastewater Acceptance

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Dear Mr. Corsentino,

My name is Raymond Andrews. I'm a Compliance Officer with the Region 10 Office of the Environmental Protection Agency (EPA). Please review the attached Notice of Violation letter. If you have any questions, please feel free to contact me by responding to this email or by phone at (206) 553-4252.

Thank you.

Sincerely,

Raymond Andrews
Compliance Officer
Surface Water Enforcement Section
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 155, 20-C04
Seattle, WA 98101
(206) 553-4252

Scientia est potentia!